

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

PIC Corporation,

Plaintiff,

v.

The Entities and Individuals Identified in  
Annex A,

Defendants.

Case No. 1:27-cv-1444

Judge Matthew F. Kennelly

**DECLARATION OF XIN CHEN IN SUPPORT OF DEFENDANT'S MOTIONS**

I, Xin Chen, declare as follows:

1. I am the Chief Executive Officer of Larryhot Trading Co., Ltd. (**Larryhot**), which operates the internet store, supvogue.com (the **Store**), identified in this lawsuit. In this capacity, I have personal knowledge of the Store's operation and sales and have access to Larryhot's business records.

2. I make this declaration based on my personal knowledge and after reviewing Larryhot's business records. If called as a witness, I can competently testify to the matters stated herein.

3. Larryhot is incorporated and has its principal place of business in China. Larryhot operates the Store exclusively in China. Larryhot has never owned or utilized an office, hired employees, agents, or representatives, maintained bank accounts, owned assets or properties, or qualified to do business in Illinois or any other part of the United States.

4. Neither the Store nor Larryhot has targeted Illinois residents with their advertisements, nor directed any marketing efforts or materials at Illinois.

5. PIC Corporation (the **Plaintiff**) alleges the Store has infringed on its trademark. Specifically, Plaintiff's counsel has provided the attached **Exhibit A**, which shows the allegedly infringing products (collectively, **Alleged Products**).

6. After reviewing the complaint and Exhibit A provided by counsel, I conducted a diligent search of the Store's sales records for the Alleged Products. **Exhibit B** contains complete and accurate sales records, maintained in the ordinary course of Larryhot's business.

7. Exhibit B shows that the Store made only one sale in Illinois and the U.S. Counsel for Plaintiff has admitted that the order was placed by Plaintiff. The buyer's name was "Winifred PIC-FTE Womyhopur," the shipping address was "260 Rocbaar Dr, Romeoville, Illinois 60446," and the phone number for the buyer was "(630) 705-0900."

8. A brief search has revealed numerous similar products available for purchase online. *See* Exhibit C. Before this litigation, the Store was not aware, nor had any reason to be aware, that it could be infringing on any copyrights or trademarks. The Store has not attempted to market or pass off its products as those of the Plaintiff or any other party.

9. The Store uses two Paypal accounts: Rnalemoa@outlook.com and RnalemoaBtn@outlook.com, for the Alleged Products, which have a total frozen amount of \$1,271,693.18 due to the asset restraints imposed by this litigation.

10. The Store still plans to continue business operations. However, the existing restraints significantly hinder the Store's liquidity and ability to maintain normal operations.

11. Upon notice of the current litigation, Larryhot has permanently removed the listings

of the Alleged Products. While Larryhot is moving to challenge the Preliminary Injunction Order (Dkt. 37), Larryhot assures the court it will not relist the Alleged Products for sale until further ordered by the court.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and accurate.

Executed on this 31<sup>st</sup> day of May 2024, in Xiamen, Fujian Province, China.

Dated: May 31<sup>st</sup>, 2024

By: Xin Chen  
Xin Chen

# EXHIBIT A



Wasp Trap for Hornet Bees Yellow Jackets 🐝 BUY 3 GET 1 FREE

\$19.96 ~~\$29.99~~

- 📦 66.2K Month Sold
- 👍 It's been recommended by 6.5K people on Facebook, Twitter and Instagram
- 👁️ 805 people are viewing this right now

BUY MORE SAVE MORE

BUY 1🔥 BUY 2 (49% DISCOUNT)

🔥🔥 BUY 3 GET 1 FREE (Extra 15% DISCOUNT) & FREE SHIPPING

Quantity

-

1

+

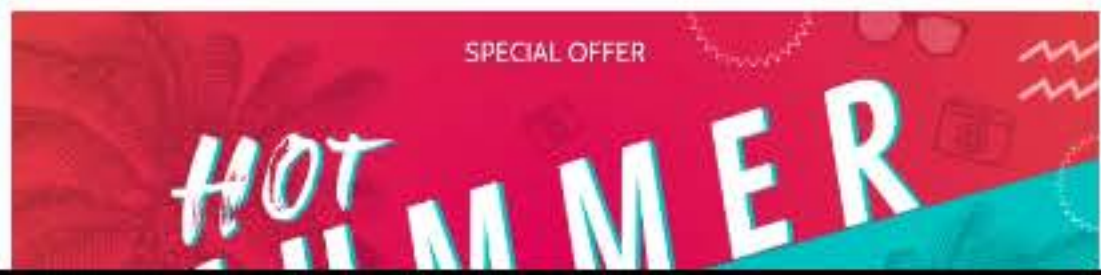


Limit Stock: Only 4% left

Tight Inventory

 ADD TO CART

BUY IT NOW





# **EXHIBIT B**







# EXHIBIT C



Get rid of fruit flies with UV light

\$42<sup>99</sup>prime



Patio, Lawn & Garden › Pest Control › Traps



### 3 Pack Wasp Trap - for Wasps, Yellow Jackets, Hornets - No Seam on The Bottom - Eliminates Leaks

Brand: Ven-Trap  
3.6 814 ratings  
300+ bought in past month

Price: **\$22.99** (\$7.66 / Count) Get **Fast, Free Shipping** with Amazon Prime  
**FREE Returns**

Get \$10 off instantly: Pay **\$12.99** \$22.99 upon approval for the Amazon Store Card. No annual fee.

Brand	Ven-Trap
Color	Yellow
Style	Classic
Material	Nylon
Product Dimensions	5"L x 5"W x 6"H
Number of Pieces	3

See more

#### About this item

- 3 TRAPS INCLUDED. NEW DESIGN. One Piece Solid Bottom means no leaking Pots which is the largest complaint of other versions.
- Cover more area and catch more! Traps lure and catches wasps, hornets, yellow jackets, bees, fruit fly and other Insects. No Pesticides required.
- HIGHLY EFFECTIVE - Comes with Instruction Manual and Bait recipe. Uses a simple Sugar and Water solution
- No Chemicals Needed. Eco-friendly. Protect your home and garden from unwanted pests. Wash and Reusable for many Seasons, safe and clean. This Catcher is all you need.
- DESIGN - Each Honey Pot comes with 18" nylon cord for hanging outdoors. Light weight, easy to use. Use Indoors for Fruit Flies.

#### Additional Details

Small Business  
This product is from a small business brand. Support small. [Learn more](#)

#### Customer ratings by feature

Scent	4.7
Easy to clean	4.2
Easy to assemble	3.9



Enjoy fast, free delivery, exclusive deals, and award-winning movies & TV shows with Prime  
Try Prime and start saving today with **fast, free delivery**

Delivery

Pickup

**One-time purchase:**  
\$22.99 (\$7.66 / Count)

Get **Fast, Free Shipping** with Amazon Prime  
**FREE Returns**

**FREE delivery June 5 - 7** on orders shipped by Amazon over \$35

Or fastest delivery **Wednesday, June 5**

Delivering to Los Angeles 90028 - [Update location](#)

**Only 1 left in stock - order soon.**

Add to Cart

Buy Now

Ships from Amazon  
Sold by MiddletonShippers  
Returns Eligible for Return, Refund or Replacement within 30 days of receipt  
Packaging Ships in product packaging

See more

☐ Add a gift receipt for easy returns

**Subscribe & Save:**  
 10% 15%  
\$20.69 (\$6.90 / Count)  
**FREE delivery June 5 - 7** on orders shipped by Amazon over \$35  
Ships from Amazon









6 pack Scorpion Glue Tray Traps for Home...

★★★★☆ 197

\$14.08 \$14.82 ✓prime

Save 5% more  
with Subscribe & Save

Patio, Lawn & Garden › Pest Control › Traps



Roll over image to zoom in



VIDEO



## Wasp Trap Outdoor Hanging, Bee Traps Catcher, Effective Outdoor Wasp Deterrent Killer Insect Catcher, Non-Toxic Reusable Hornet Yellow Jacket Trap - Yellow, 2 Pack

Brand: Protecker

5.0 ★★★★★ 9 ratings

300+ bought in past month

\$16<sup>99</sup> (\$8.50 / Count)

Get **Fast, Free Shipping** with Amazon Prime

FREE Returns

**Coupon:** ☐ Apply 5% coupon [Shop items >](#) | [Terms](#)

Get \$10 off instantly: Pay \$6.99 \$16.99 upon approval for the Amazon Store Card. No annual fee.

Color: yellow

 \$16.99 (\$8.50 / Count)

 \$16.99

Brand Protecker

Color yellow

Number of Pieces 2

### About this item

- 🍷 【GREEN & DURABLE WASP TRAP】 The wasp bee killer is made of durable and ABS material, which is rain-proof, sun-proof and corrosion-resistant, suitable for use in different weathers such as high temperature, rain and fog. Wasp traps use natural non-toxic bait to capture wasps without any chemical preparations and are not harmful to the environment. Wasp trap outdoor hanging won't fall off easily as long as they're secured to branches, etc. with the included nylon cord.
- 🌸 【GET RID OF WASPS SAFELY】 This bee wasp traps catcher is a great solution for getting rid of wasps, yellow jackets, wasps, flies, and more insects in a safe and non-toxic way! You only need to use natural bait to trap wasps in wasp repellent outdoor, without worrying about the threat of pesticides and chemical agents to the safety of your home, pets and children. Our wasp catchers are durable enough to protect your garden, patio and more from wasp infestation from spring to fall.
- 🌟 【EASY TO USE & REUSABLE WASP KILLER】 The wasp traps for outdoors are very easy to use, simply add the formulated natural non-toxic bait(sugar, apple juice, jam, etc.)to the yellow jacket trap and hang the trap at a suitable distance from your home where there are plenty of insects. No seam on the bottom of the wasp trap, no leakage. The bee trap made of durable materials can be reused many times, just empty it when it is full, wash it with warm



Enjoy fast, free delivery, exclusive deals, and award-winning movies & TV shows with Prime  
[Try Prime](#) and start saving today with fast, free delivery

Delivery

Pickup

\$16<sup>99</sup> (\$8.50 / Count)

Get **Fast, Free Shipping** with

Amazon Prime

FREE Returns

FREE delivery **Wednesday, June 5** on orders shipped by Amazon over \$35

Or fastest delivery **Saturday, June 1.** Order within **13 hrs 20 mins**

📍 Delivering to Los Angeles 90028 - [Update location](#)

In Stock

Quantity: 1

Add to Cart

Buy Now

Ships from Amazon

Sold by Cozy garden

Returns Eligible for Return, Refund or Replacement within 30 days of receipt  
Secure transaction

☐ Add a gift receipt for easy returns

Add to List







Catchmaster Scorpion Glue Tray Traps, 6-Pack...

★★★★☆ 197

\$14.08 ~~\$14.82~~ prime

Save 5% more  
with Subscribe & Save

Patio, Lawn & Garden › Pest Control › Traps



Roll over image to zoom in



VIDEO

## Wasp Trap Bee Traps Catcher, Wasp Trap Outdoor Hanging, Wasp Repellent Trap Deterrent Killer Hornet Fly Insect Catcher, Non-Toxic Reusable Yellow Jacket Trap Hanging (Orange-2pack)

Brand: LCUXOWX

4.3 ★★★★★ 14 ratings

100+ bought in past month

Price: **\$16.79** (\$8.40 / Count) Get **Fast, Free Shipping** with Amazon Prime  
**FREE Returns**

Get \$10 off instantly: Pay **\$6.79** ~~\$16.79~~ upon approval for the Amazon Store Card.  
No annual fee.

Color: **Orange-2pack**

Brand	LCUXOWX
Color	Orange-2pack
Style	Wasp Trap Bee Traps
Material	Plastic
Number of Pieces	2
Is Electric	No
Target Species	Fly

### About this item

- ★ **【ECO-FRIENDLY & DURABLE MATERIAL TRAP】** The bee killer is made of durable and eco-friendly ABS plastic material, which is rain-proof, sun-proof and corrosion-resistant, suitable for use in different weathers such as high temperature, rain and fog. Wasp traps use natural non-toxic bait to capture wasps without any chemical preparations and are not harmful to the environment. Wasp traps outdoor hanging won't fall off easily as long as they're secured to branches, etc. with the included nylon cord.
- 🐝 **【HANG BEE CATCHER WHERE YOU WANT】** Wasp killer is suitable for use in gardens, farms, orchards, camping, vegetable gardens, patios and more. Hanging yellow jacket traps are better at catching wasps, each wasp repellent outdoor comes with an 18" nylon cord, making it very convenient to hang outdoors. You just hang it wherever you need!
- 🌸 **【EFFECTIVE & UNIQUE DESIGN WASP TRAPS】** The wasp trapper is designed with 6 entrances, and the multi-entry design can increase the chances of attracting insects into the trap. The wasp repellent outdoor has a large entrance but a small exit, and a wasp entering a yellow jacket trap will not be able to escape. The hornet trap has multiple small holes distributed around the entrance to help distribute the scent of the bait and more effectively attract and capture wasps, yellow jackets etc.
- 🔥 **【GET RID OF WASPS SAFELY】** This bee wasp traps catcher is a great

prime

Enjoy fast, free delivery, exclusive deals, and award-winning movies & TV shows with Prime  
Try Prime and start saving today with fast, free delivery

Delivery

Pickup

**One-time purchase:**  
**\$16.79** (\$8.40 / Count)

Get **Fast, Free Shipping** with Amazon Prime  
**FREE Returns**

**FREE delivery** **Wednesday, June 5** on orders shipped by Amazon over \$35

Or fastest delivery **Tomorrow, May 31**. Order within **1 hr 54 mins**

📍 Delivering to Los Angeles 90028 -  
Update location

In Stock

Quantity: 1

Add to Cart

Buy Now

Ships from Amazon  
Sold by **awaken2023**  
Returns **Eligible for Return, Refund or Replacement within 30 days of receipt**  
Packaging **Ships in product packaging**

See more

☐ Add a gift receipt for easy returns

**Subscribe & Save:**  
**\$16.79** (\$8.40 / Count)  
**FREE delivery** **Wednesday, June 5** on orders shipped by Amazon



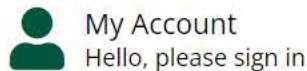
See Today's Offers (8) ▼

Enjoy FREE SHIPPING on Everything! Use Code: FSNM67 ⓘ



Search by keyword or item #

Search



better senior living®

The Lighter Side® Betty's Attic®

Things You Never Knew Existed..®

MENU ALL DEPARTMENTS

NEW ARRIVALS

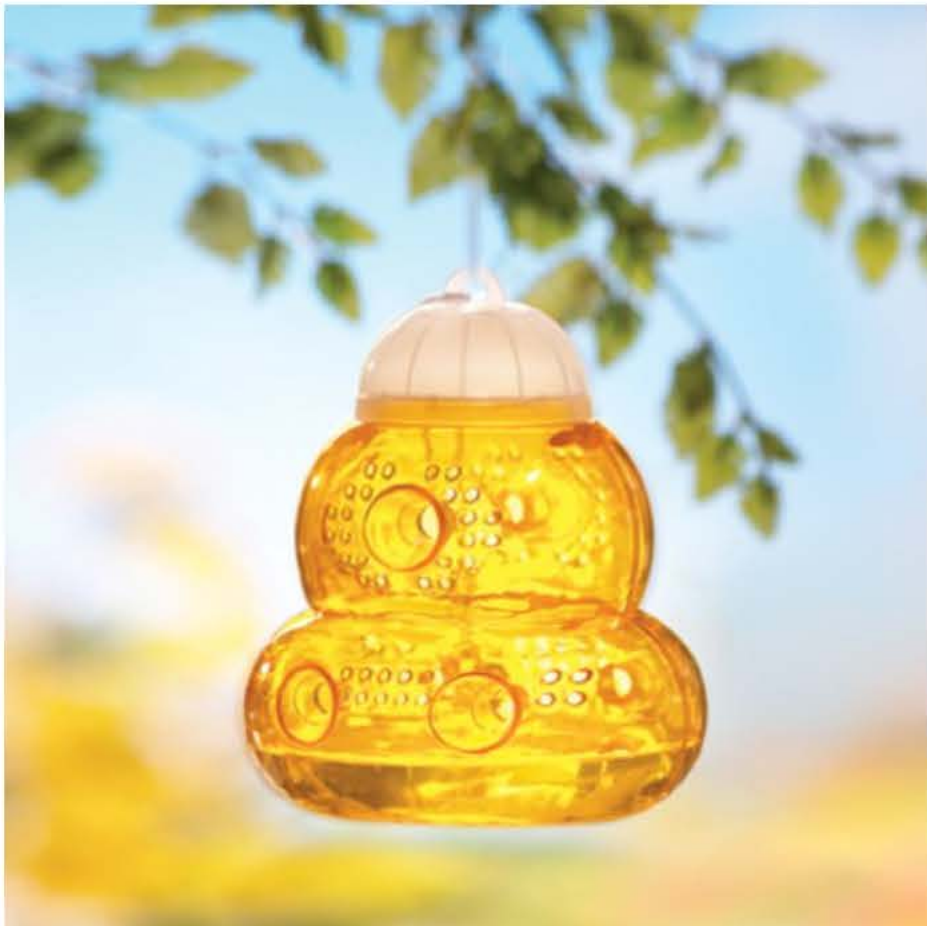
GARDEN ACCENTS

PATRIOTIC DECOR

SUMMER FAVORITES

NEW MARKDOWNS

Home > Outdoor Hanging Wasp Trap



🔍View Larger

### Outdoor Hanging Wasp Trap

★★★★☆ 4.2 122 Reviews [Write a Review](#) | Item #29220

**Sale**  
**\$8.99** ~~\$16.99~~  
Save up to 47%

**PayPal** Pay in 4 interest-free payments on purchases of \$30-\$1,500. [Learn more](#)

−

1

+

Add to Cart



Shop with Confidence at Collections Etc.

- 50+ Years of Providing Unbeatable Values
- Satisfaction Guaranteed on All Purchases
- Safe, Secure & Fast Checkout

#### Product Description

Rid your yard of annoying, and potentially dangerous, wasps. Traps yellowjackets and wasps inside with an irresistible lure of water and sugar, juice or fruit – and then doesn't let them out! Hang it near a patio or deck to keep your backyard activities sting-free. Reusable for years. Hanger included. Rinses clean. 6"H.

#### Customers Also Like

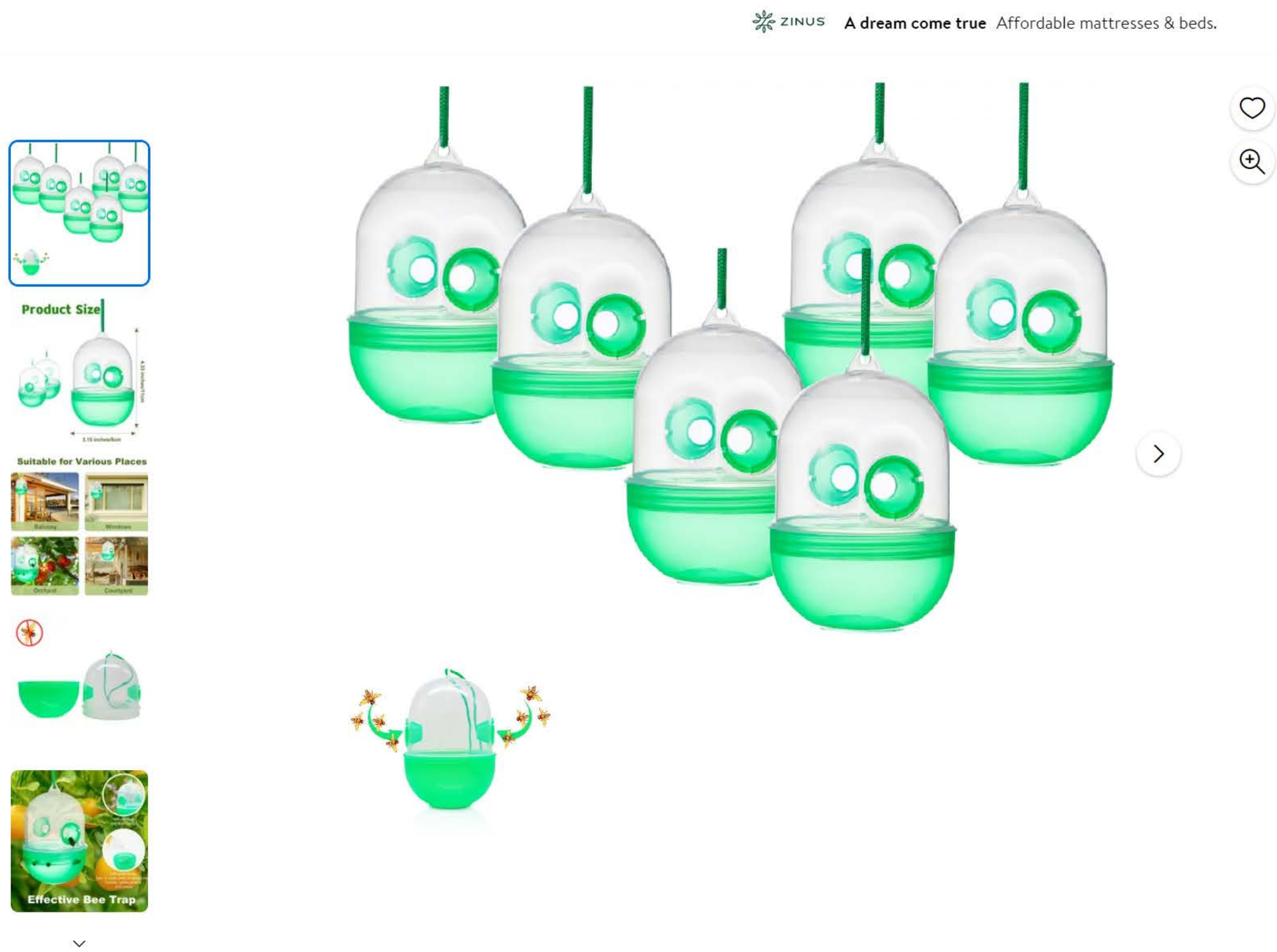








Household Essentials / Pest Control / All Pest Control



TRIANU Wasp Trap Bee Traps Catcher, 6Pcs Wasp Traps Outdoor Hanging, Wasp Repellent Trap Deterrent Killer Insect Catcher, Non-Toxic Reusable Yellow Jacket Trap, Green

Free shipping Free 30-day returns

\$20.99


Price when purchased online

Add to cart


Count: 6

3 \$11.99 6 \$20.99


How do you want your item?



Shipping  
Arrives Jun 13  
Free



Pickup  
Not available



Delivery  
Not available

Delivery to Los Angeles, 90020

Sold and shipped by TRIANU

45 seller reviews  
View seller information

Free 30-day returns Details

Add to list

Add to registry

Similar items you might like

Based on what customers bought

Best seller



Best seller



Best seller







6 pack Scorpion Glue Tray Traps for Home...

★★★★☆ 197

\$14.08\$14.82prime

Save 5% more  
with Subscribe & Save

Patio, Lawn & Garden › Pest Control › Traps



Roll over image to zoom in



2 VIDEOS



## Wasp Traps Outdoor Hanging, Bee Traps Repellent Yellow Jacket Catchers Killer for Outside, Hornet Deterrent Non-Toxic Reusable Hanging Wasp Traps (Pear Shape - 2 Pack)

Brand: ENERJARY

5.0★★★★☆ 3 ratings

\$16<sup>99</sup>

Get **Fast, Free Shipping** with Amazon Prime

FREE Returns

**Coupon:** ☐ Apply 5% coupon [Shop items >](#) | [Terms](#)

Get \$10 off instantly: Pay \$6.99 \$16.99 upon approval for the Amazon Store Card. No annual fee.

Brand	ENERJARY
Color	yellow-xl
Product Dimensions	1"L x 1"W x 1"H

### About this item

- 🐝 **【LOOKING FOR A SAFE SOLUTION TO THE WASP PROBLEM?】** Try this pear-shaped wasp trap! It is an environmentally friendly bee trap that uses natural non-toxic bait to catch a variety of flying insects such as wasps, yellow jackets, hornets, and flies. It can be safely and long-lasting set in gardens, backyards and other places where children and pets are active without worrying about endangering their safety. Our wasp catchers are durable enough to protect your home from wasps from spring to fall.
- 🐝 **【UNIQUELY DESIGNED NEW VERSION WASP CATCHER】** This wasp trapper is new version, designed in a lovely pear shape, helping you get rid of wasp infestation while embellishing your garden, courtyard, etc., it is a beautiful outdoor decoration. The bright orange color can attract wasps, and the trap is designed with 6 inlets and several small air holes, which can emit the smell of the bait and let more wasps enter the trap. The exit is small and the wasps that enter will not be able to escape.
- 🐝 **【EASY TO USE AND REUSABLE WASP KILLER】** The newly upgraded pear-shaped wasp trap comes with 2 attractants, so that you can set the trap to catch wasps as soon as you receive it, and each bee trap comes with 18" nylon cord for hanging outdoors. Wasp traps are easy to use, just add the included attractant, or make your own bait (use sugar, apple juice, meat, etc.) and hang the trap where it's needed. Yellow jacket traps are reusable, simply empty the trap when full, wash with water and rebait.
- 🐝 **【DURABLE AND HIGH QUALITY EFFECTIVE WASP TRAP】** The bee killer is made of durable and eco-friendly ABS plastic material, which is rainproof, sunscreen and corrosion resistant. Suitable for use in different weathers, such as heat, rain and fog. The wasp trap adopts a detachable design, which is



Enjoy fast, free delivery, exclusive deals, and award-winning movies & TV shows with Prime  
Try Prime and start saving today with fast, free delivery

Delivery

Pickup

\$16<sup>99</sup>

Get **Fast, Free Shipping** with Amazon Prime  
FREE Returns

FREE delivery **Wednesday, June 5** on orders shipped by Amazon over \$35

Or fastest delivery **Tomorrow, May 31.** Order within **2 hrs 17 mins**

Delivering to Los Angeles 90028 - Update location

In Stock

Quantity: 1

Add to Cart

Buy Now

Ships from Amazon  
Sold by MRProducts Direct  
Returns Eligible for Return, Refund or Replacement within 30 days of receipt  
Payment Secure transaction

☐ Add a gift receipt for easy returns

Add to List

